

EXHIBIT C



U.S. Department of Justice
United States Attorney
Eastern District of Pennsylvania

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October 10, 2009

Mark Jay Krum, Esq.
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BY ELECTRONIC MAIL (MarkJayKrum@aol.com)

**RE: Discovery in United States v. Emanuel E. Patterson
Criminal No. 09-513**

Dear Mr. Krum:

Enclosed are scanned documents of additional discovery materials in the above-referenced case, which have been Bates-numbered COM-295 through COM-306. Included are copies of Media Borough police interview reports of Rahsaan Ford and Norman Hawkins, a SEPTA police crime scene log and an information sheet, the C.V. for Police Officer Shane T. Gaghan (firearms examiner for the Philadelphia Police Department FIU), and a 302 report of interview for Charles Mercer (the same report that the government provided to you yesterday at the hearing).

Absent a stipulation, the government anticipates that Officer Gaghan would testify that the Talon Industries T100 .380 caliber pistol recovered in this case is a "firearm" as defined in 18 U.S.C. § 921(a)(3). More specifically, Officer Gaghan would testify that the pistol was designed to and could readily be converted to expel a projectile by the action of an explosive.


You previously asked whether the government intended to use any of the prison recordings from the FDC at trial. I advise you that the government does not intend to use any of the recordings in its case in chief. However, the government reserves its right to use the recordings in rebuttal or during cross examination.

You also requested copies of written plea agreements for Rahsaan Ford and Norman Hawkins. The plea agreement for Ford is attached. There is no written plea agreement for Norman Hawkins because he pled open to the indictment.

Please contact us immediately if you do not receive all of the enclosed materials or have any questions or additional requests.

Very truly yours,

MICHAEL L. LEVY
United States Attorney



ANTHONY G. KYRIAKAKIS
Assistant United States Attorney